

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
SARAH PALIN	:	
	:	
Plaintiff,	:	No. 17 Civ. 4853 (JSR)
	:	ECF Case
	:	
-against-	:	
	:	
	:	
THE NEW YORK TIMES COMPANY and JAMES	:	
BENNET,	:	
	:	
Defendants.	:	
-----	X	

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, pursuant to the Court's direction on November 23, 2020, Defendants The New York Times Company and James Bennet will file a motion pursuant to Fed. R. Civ. Proc. 54(b), requesting that the Court modify its earlier Opinion and Order, Dkt. 117, and rule that, pursuant to the recently amended Anti-SLAPP statute, New York state law requires that Plaintiff establish actual malice by clear and convincing evidence. Defendants' moving papers (up to 5 pages) are due on November 30, 2020, Plaintiff's answering papers (up to 5 pages) are due on December 7, 2020, and Defendants' reply papers (up to 2 pages) are due on December 9, 2020. The Court will inform the parties if it decides to hear oral argument on the motion.

Dated: New York, New York  
November 25, 2020

Respectfully submitted,

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